

Last revised 8/1/15

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:
Nicole D. Reynolds

Case No.: 15-31182
Judge: Jerrold N. Poslusny, Jr.
Chapter: 13

Debtor(s)

Chapter 13 Plan and Motions

- | | | |
|---|--|--|
| <input type="checkbox"/> Original | <input checked="" type="checkbox"/> Modified/Notice Required | <input checked="" type="checkbox"/> Discharge Sought |
| <input type="checkbox"/> Motions Included | <input type="checkbox"/> Modified/No Notice Required | <input type="checkbox"/> No Discharge Sought |

Date: 9/15/2016

THE DEBTOR HAS FILED FOR RELIEF UNDER
CHAPTER 13 OF THE BANKRUPTCY CODE

YOUR RIGHTS WILL BE AFFECTED

You should have received from the court a separate *Notice of the Hearing on Confirmation of Plan*, which contains the date of the confirmation hearing on the Plan proposed by the Debtor. This document is the actual Plan proposed by the Debtor to adjust debts. You should read these papers carefully and discuss them with your attorney. Anyone who wishes to oppose any provision of this Plan or any motion included in it must file a written objection within the time frame stated in the Notice. **This Plan may be confirmed and become binding, and included motions may be granted without further notice or hearing, unless written objection is filed before the deadline stated in the Notice.**

**YOU SHOULD FILE A PROOF OF CLAIM BY THE DEADLINE STATED
IN THE NOTICE TO RECEIVE DISTRIBUTIONS UNDER ANY PLAN
THAT MAY BE CONFIRMED, EVEN IF THE PLAN REFERS TO YOUR CLAIM**

Part 1: Payment and Length of Plan

a. The debtor shall pay \$ 488.00 per month to the Chapter 13 Trustee, starting on October 1, 2016 for approximately 49 months.

b. The debtor shall make plan payments to the Trustee from the following sources:

- ☒ Future earnings
- ☐ Other sources of funding (describe source, amount and date when funds are available):

c. Use of real property to satisfy plan obligations:

- ☐ Sale of real property

Description:

Proposed date for completion: _____

- ☐ Refinance of real property:

Description:

Proposed date for completion: _____

- ☐ Loan modification with respect to mortgage encumbering property:

Description:

Proposed date for completion: _____

- d. ☐ The regular monthly mortgage payment will continue pending the sale, refinance or loan modification.

- e. ☐ Other information that may be important relating to the payment and length of plan:

Part 2: Adequate Protection

a. Adequate protection payments will be made in the amount of \$ _____ to be paid to the Chapter 13 Trustee and disbursed pre-confirmation to _____ (creditor).

b. Adequate protection payments will be made in the amount of \$ _____ to be paid directly by the debtor(s) outside the Plan, pre-confirmation to: _____ (creditor).

Part 3: Priority Claims (Including Administrative Expenses)

All allowed priority claims will be paid in full unless the creditor agrees otherwise:

Creditor	Type of Priority	Amount to be Paid
Law Offices of Seymour Wasserstrum	Attorney Fees	\$2,960.00
Twp of Winslow	Water and Sewer	\$796.51
Camden County MUA	Sewer	\$199.16

Part 4: Secured Claims

a. Curing Default and Maintaining Payments

The Debtor shall pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor shall pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)
Midland Mortgage	Mortgage on residence	\$11,148.86	none	\$11,148.86	\$1,100.33

b. Modification

1.) The debtor values collateral as indicated below. If the claim may be modified under Section 1322(b)(2), the secured creditor shall be paid the amount listed as the "Value of the Creditor Interest in Collateral," plus interest as stated. The portion of any allowed claim that exceeds that value shall be treated as an unsecured claim. If a secured claim is identified as having "NO VALUE" it shall be treated as an unsecured claim.

NOTE: A modification under this Section ALSO REQUIRES the appropriate motion to be filed under Section 7 of the Plan.

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor Interest in Collateral	Annual Interest Rate	Total Amount to be Paid
Capital One Auto Finance	2011 Chrysler 200	\$11,327.81	\$9,525.00	none	\$9,525.00	5%	\$10,785.00
U.S. Department of Housing and Urban Development	13 Blossom Trail, Sicklerville, NJ 08810	\$6,188.36	\$102,000.00	\$118,575.19	\$0.00	n/a	\$0.00

2.) Where the Debtor retains collateral and completes the Plan, payment of the full amount of the allowed secured claim shall discharge the corresponding lien.

c. Surrender

Upon confirmation, the stay is terminated as to surrendered collateral. The Debtor surrenders the following collateral:

Creditor	Collateral to be Surrendered	Value of Surrendered Collateral	Remaining Unsecured Debt

d. Secured Claims Unaffected by the Plan

The following secured claims are unaffected by the Plan:

e. Secured Claims to be Paid in Full Through the Plan:

Creditor	Collateral	Total Amount to be Paid Through the Plan

Part 5: Unsecured Claims

a. Not separately classified allowed non-priority unsecured claims shall be paid:

☒ Not less than \$ _____ 0 _____ to be distributed *pro rata*

☐ Not less than _____ 0 _____ percent

☐ *Pro Rata* distribution from any remaining funds

b. Separately classified unsecured claims shall be treated as follows:

Creditor	Basis For Separate Classification	Treatment	Amount to be Paid

Part 6: Executory Contracts and Unexpired Leases

All executory contracts and unexpired leases are rejected, except the following, which are assumed:

Creditor	Nature of Contract or Lease	Treatment by Debtor

Part 7: Motions

NOTE: All plans containing motions must be served on all potentially affected creditors, together with local form, *Notice of Chapter 13 Plan Transmittal*, within the time and in the manner set forth in D.N.J. LBR 3015-1. A *Certification of Service* must be filed with the Clerk of Court when the plan and transmittal notice are served.

a. Motion to Avoid Liens Under 11. U.S.C. Section 522(f).

The Debtor moves to avoid the following liens that impair exemptions:

Creditor	Nature of Collateral	Type of Lien	Amount of Lien	Value of Collateral	Amount of Claimed Exemption	Sum of All Other Liens Against the Property	Amount of Lien to be Avoided

b. Motion to Avoid Liens and Reclassify Claim From Secured to Completely Unsecured.

The Debtor moves to reclassify the following claims as unsecured and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Amount of Lien to be Reclassified
U.S. Department of Housing and Urban Development	13 Blossom Trail, Sicklerville, NJ 08810	\$6,188.36

c. Motion to Partially Void Liens and Reclassify Underlying Claims as Partially Secured and Partially Unsecured.

The Debtor moves to reclassify the following claims as partially secured and partially unsecured, and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Amount to be Deemed Secured	Amount to be Reclassified as Unsecured
Capital One Auto Finance	2011 Chrysler 200	\$10,785	\$2,000

Part 8: Other Plan Provisions

a. Vesting of Property of the Estate

- ☒ Upon confirmation
☐ Upon discharge

b. Payment Notices

Creditors and Lessors provided for in Parts 4, 6 or 7 may continue to mail customary notices or coupons to the Debtor notwithstanding the automatic stay.

c. Order of Distribution

The Trustee shall pay allowed claims in the following order:

- 1) Trustee commissions
- 2) Priority Claims
- 3) Secured Claims
- 4) Unsecured Claims

d. Post-Petition Claims

The Trustee ☐ is, ☒ is not authorized to pay post-petition claims filed pursuant to 11 U.S.C. Section 1305(a) in the amount filed by the post-petition claimant.

Part 9: Modification

If this Plan modifies a Plan previously filed in this case, complete the information below.

Date of Plan being Modified: July 19, 2016.

Explain below **why** the plan is being modified:

To change the treatment of the United States Department of Housing and Urban Development's junior mortgage claim.

Explain below **how** the plan is being modified:

To remove the claim of the United States Department of Housing and Urban Development from Part 4(d) of the Chapter 13 Plan and to include the claim in Part 4(b) and Part 7(b) as a claim that we are seeking to modify from secured to completely unsecured as the first mortgage lien exceeds the value of the property.

Are Schedules I and J being filed simultaneously with this Modified Plan? ☐ Yes ☒ No

Part 10: Sign Here

The Debtor(s) and the attorney for the Debtor (if any) must sign this Plan.

Date: 9/15/2016

/s/ Seymour Wasserstrum

Attorney for the Debtor

I certify under penalty of perjury that the above is true.

Date: 9/15/2016

/s/ Nicole D. Reynolds

Debtor

Date: _____

Joint Debtor

Certificate of Notice Page 8 of 9
 United States Bankruptcy Court
 District of New Jersey

In re:
 Nicole D. Reynolds
 Debtor

Case No. 15-31182-JNP
 Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-1

User: admin
 Form ID: pdf901

Page 1 of 2
 Total Noticed: 34

Date Rcvd: Sep 22, 2016

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 24, 2016.

db +Nicole D. Reynolds, 13 Blossom Trail, Sicklerville, NJ 08081-3064
 cr +Township of Winslow, c/o Platt & Riso, P.C., 40 Berlin Road, Stratford, NJ 08084-1404
 515912844 +Advocate the Womens Grp OBGYN, PO Box 3001, Voorhees, NJ 08043-0598
 515843513 Camden County MUA, Regional Sewer Service, P.O. Box 1105, Bellmawr, NJ 08099-5105
 515955757 +Camden County MUA, 1645 Ferry Avenue, Camden, NJ 08104-1311
 516392564 Capital One Auto Finance, PO Box 301347, Arlington, TX 76006
 515843515 +Convergent Healthcare Inc, RE: Medical - Cooper, 124 Sw Adams St Ste 215,
 Peoria, IL 61602-2321
 515843516 EZpass, New Jersey Customer Service, PO Box 52003, Newark, NJ 07101-8203
 515912845 Enterprise Rent-A-Car, PO Box 801988, Kansas City, MO 64180-1988
 515843517 +Financial Recovery, RE: Kennedy Health System, PO Box 1388, Mt Laurel, NJ 08054-7388
 515843521 +Kennedy Health System, 500 Marlboro Ave, Cherry Hill, NJ 08002-2020
 515876799 +MidFirst Bank, 999 NorthWest Grand Boulevard, Oklahoma City, OK 73118-6051
 515843522 +Midland Mortgage, PO Box 268959, Oklahoma City, OK 73126-8959
 515843523 Mnet Financial, 95 Argonaut, Suite 250, Aliso Viejo, CA 92656-4142
 515843525 Office Of Attorney General, Richard J Hughes Justice Complex, 25 Market St, P.O. Box 112,
 Trenton, NJ 08625-0112
 515843526 +Qual Asset Recovery, 7 Foster Ave Suite 101, Gibbstown, NJ 08026-1191
 515843528 ++STATE OF NEW JERSEY, DIVISION OF TAXATION BANKRUPTCY UNIT, PO BOX 245,
 TRENTON NJ 08646-0245
 (address filed with court: State Of New Jersey, Divison Of Taxation, P.O. Box 245,
 Trenton, NJ 08695)
 515843527 +South Jersey Gas, Customer Care Center, P.O. Box 577, Hammonton, NJ 08037-0577
 515859908 +Township of Winslow, c/o Platt & Riso, P.C., 40 Berlin Avenue,
 Stratford, New Jersey 08084-1404
 516392565 +U.S. Department of Housing, 751 7th St SW, Washington, DC 20410-0001
 515865066 +U.S. Dept of Housing Urban Development, 451 7th Street S.W., Washington, D.C 20410-0002

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

smg E-mail/Text: usanj.njbankr@usdoj.gov Sep 22 2016 23:14:13 U.S. Attorney, 970 Broad St.,
 Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534
 smg +E-mail/Text: ustpregion03.ne.ecf@usdoj.gov Sep 22 2016 23:14:10 United States Trustee,
 Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100,
 Newark, NJ 07102-5235
 515843512 +E-mail/Text: bankruptcy@pepcoholdings.com Sep 22 2016 23:13:52 Atlantic City Electric,
 Pepco Holdings Inc, Bankruptcy Division, 5 Collins Drive Suite 2133,
 Carneys Point, NJ 08069-3600
 515912843 E-mail/PDF: ch.collections@verizon.net Sep 22 2016 23:10:14 C&H Collection Services Inc,
 PO Box 1399, Merchantville, NJ 08109-0399
 515843514 E-mail/PDF: AIS.COAF.EBN@americaninfosource.com Sep 22 2016 23:10:29
 Capital One Auto Finance, P.O.Box 60511, City Of Industry, CA 91716-0511
 516015409 +E-mail/PDF: acg.acg.ebn@americaninfosource.com Sep 22 2016 23:10:28
 Capital One Auto Finance, c/o Ascension Capital Group, P.O. Box 201347,
 Arlington, TX 76006-1347
 515908934 +E-mail/PDF: acg.acg.ebn@americaninfosource.com Sep 22 2016 23:16:34
 Capital One Auto Finance, a division of Capital One, Ascension Capital Group,
 P.O. Box 201347, Arlington, TX 76006-1347
 515912847 +E-mail/Text: equiles@philapark.org Sep 22 2016 23:15:02 City of Philadelphia,
 PO Box 41818, Phila, PA 19101-1818
 515843519 E-mail/Text: cio.bncmail@irs.gov Sep 22 2016 23:13:45 Internal Revenue Service,
 Officer, a managing or general agent, PO Box 744, Springfield, NJ 07081-0744
 515843524 +E-mail/Text: clientservices@northwestcollectors.com Sep 22 2016 23:13:47
 Northwest Collections, RE: The Endo Center At Voor, 3601 Algonquin Road,
 Rolling Meadows, IL 60008-3126
 515912842 E-mail/Text: bkrpt@retrievalmasters.com Sep 22 2016 23:14:08 RMCB, PO Box 1235,
 Elmsford, NY 10523-0935
 515912846 +E-mail/Text: bankruptcydepartment@tsico.com Sep 22 2016 23:14:57 Transworld Systems Inc,
 507 Prudential Road, Horsham, PA 19044-2308
 515843529 +E-mail/Text: chegyi@winslowtownship.com Sep 22 2016 23:14:12 Winslow Township,
 125 Route 73 South, Braddock, NJ 08037-9422

TOTAL: 13

***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****

515843520* ++INTERNAL REVENUE SERVICE, CENTRALIZED INSOLVENCY OPERATIONS, PO BOX 7346,
 PHILADELPHIA PA 19101-7346
 (address filed with court: Internal Revenue Service, P.O. Box 724, Springfield, NJ 07081)
 515843518* +Internal Revenue Service, Officer, a managing or general agent,, PO Box 7346,
 Philadelphia, PA 19101-7346

District/off: 0312-1

User: admin
Form ID: pdf901

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Total Noticed: 34

Date Rcvd: Sep 22, 2016

515843511 ##+Apex Assest Management, 1891 Santa Barbara Dr #204, Lancaster, PA 17601-4106

TOTALS: 0, * 2, ## 1

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '++' were redirected to the recipient's preferred mailing address
pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices
will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The
debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner
shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social
Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required
by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Sep 24, 2016

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email)
system on September 15, 2016 at the address(es) listed below:

CherylLynn Walters on behalf of Creditor Township of Winslow cwalters@prlawoffice.com
Denise E. Carlon on behalf of Creditor MidFirst Bank dcarlon@kmlawgroup.com,
bkgroup@kmlawgroup.com
Isabel C. Balboa ecfmil@standingtrustee.com, summarymail@standingtrustee.com
Joshua I. Goldman on behalf of Creditor MidFirst Bank jgoldman@kmlawgroup.com,
bkgroup@kmlawgroup.com
Seymour Wasserstrum on behalf of Debtor Nicole D. Reynolds mylawyer7@aol.com,
ecf@seymourlaw.net

TOTAL: 5